

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE**

Chris Sevier Plaintiff V. Apple Inc and Hewlett- Packard		CASE NO: 3:13-cv-00607 Honorable Judge Campbell
---	--	--

**NOTICE OF FILING SECOND AMENDED COMPLAINT AS A MATTER OF COURSE
UNDER RULE 15(a) OR ALTERNATIVELY MOTION TO FILE AN AMENDED
COMPLAINT**

For the love of money is the root of all kinds of evil. And some people, craving money, have wandered from the true faith and pierced themselves with many sorrows. 1 Timothy 6:10

NOW COMES I, Chris Sevier, pro se, under rule 15(a) of the Federal Rules of Civil Procedure, filing and amended complaint as a matter of course within 21 days after being served the Defendants' 12(b)(6) motion. Rule 15 states:

(1) Amending as a Matter of Course. A party may amend its pleading once as a matter of course within:

(A) 21 days after serving it, or

(B) if the pleading is one to which a responsive pleading is required, 21 days after service of a responsive pleading or 21 days after service of a motion under [Rule 12\(b\)](#)

In the 6th Circuit and all others, "the right to amend once as a matter of course terminates 21 days after service of a motion under Rule 12(b). This provision will force the pleader to consider carefully and promptly the wisdom of amending to meet the arguments in the motion. The right to amend once as a matter of course is no longer terminated by service of a responsive pleading. The responsive pleading may point out issues that the original pleader had not considered and persuade the pleader that amendment is wise. Just as amendment was permitted by former Rule 15(a) in response to a motion, so the amended rule permits one amendment as a matter of course in response to a responsive pleading. The right is subject to the same 21-day limit as the right to amend in response to a motion."

Before even filing the 12(b) motion, the Defendants complained about the fact that I failed to spell Hewlett-Packards name correct in the first amended complaint. I forgot to include a hyphen. Such errors and others should be corrected in the amended complaint, other matters raised in their 12(b) motion will be tackled as well, such as the fact that Apple and Hewlett-Packard are in bed with predatory pornographers, who they commission to target their customers in an effort to maximize profits. They carry out extreme forms of fraud and will say and do anything in the name of greed, and could care less about the fact that their are putting law enforcement at risk, while increasing the demand side of sex trafficking. Well enough is enough.

In terms of the first amended complaint, the complaint was designed to promote peace and settlement. In the 6th Circuit and all others, the spirit of the law encourages settlement, which is true even if settlement would be adverse to the financial interest of the Defendants' outside litigation firm. I am a proponent of following these commands: *Blessed are the peacemakers, for they will be called children of God. Matthew 5:9; If it is possible, as far as it*

depends on you, live at peace with everyone. Romans 12:18. But I tell you, love your enemies and pray for those who persecute you. Matthew 5:44.

Very obviously, I wanted to give Apple and Hewlett-Packard every opportunity to consider my proposed rule 68 offer of settlement. I do not want to be the Rosa Parks of online pornography, as one publication wrote about me. I wanted Apple and Hewlett-Packard the chance to be the hero and to live up to their false marketing campaigns as being pro-family. Apple and Hewlett-Packard sell and distribute products that contain some content that is legal and other data that is illegal, addicting, and damaging. They know that they are in violation of child obscenity laws and that they are exposing their customers to overwhelming temptation and vicious attacks by pornography predators, who these Defendants are in bed with. By the time this lawsuit is over, the extent of there corrupt practices that gets revealed will be incredibly shocking. The FCC, FTC, and Attorney General will be responsive in shutting down this sexual holocaust that the Defendants have inflicted on the world as the result of their greed.

Apple and Hewlett-Packard know that by selling the products in the condition it is in, they are welcoming, encouraging, enticing, authorizing, and ratifying pornographic predators to "hunt down" and prey on their unsuspecting and less tech savvy costumers, like myself. Apple and Hewlett-Packard know that porn content creators are causing their customers to not only get hooked a specific set of porn, but rather, to get hooked on Apple's and Hewlett-Packard's products themselves. It is the Defendants key pad, power supply, and mouse that allows their customers to access the porn they distribute. It is the Defendants audio system and screen that box itself that the customers bond with upon orgasm. A chemical dependency is occurring, a rewiring of the reward cycle, all of which Apple and Hewlett-Packard knows benefits them

above all others. Yet, Apple and Hewlett-Packard put forth herculean efforts to show that they have clean hands and do nothing about this global problem that they are driving.

As our CIA operatives learned in hunting down Osama Bin Ladin, you can always find the devil in the lie. The great lie here is that Apple and Hewlett-Packard are not the greatest of all pornographic predators; that they are champions of families and innocence, when they are acting in concert with porn predators. Apple and Hewlett-Packard are not champions of free speech. They place the speech of sex addiction, sex trafficking, sexual compulsive behavior over the speech of innocence, intimacy, and purity, which cannot coexist together. These realities are clearly part of the Defendants marketing strategy that is as fraudulent as Tobacco companies, which even more catastrophic consequences because our children, daughters, and marriages are threatened. Apple and Hewlett-Packard defective and dangerous products are sold in a manner that creates a landscape where pornographic predators can ensnare and entangle their customers into viral sex addictions that ultimately create a chemical dependency on Apple and Hewlett-Packard devices in the same way that having sex with a blow up doll does.

So the original complaint was to give Apple and Hewlett-Packard the opportunity to come clean on their own by selling their products with filters and impose a system of actual accountability and safety because enough is enough. As an overseas missionary, I can attest after dealing with evil directly that when you take it returns evil for good. (*Proverbs 17:13. Evil will never leave the house of one who pays back evil for good.*)

There is a saying we had in the Army, "no good deed goes unpunished." Because I was trying to be merciful instead of pugilistic, Apple and Hewlett-Packard, in keeping with their rotten nature that has been polluted by greed and an inflated view of themselves has move to use

a grace offering as a sword against me. I should be allowed to amend the complaint to bring Apple and Hewlett-Packard to the heel. Apple and Hewlett-Packard think that just because they are "Apple" and "Hewlett-Packard," they do not have to comply with the law. *(NOTE: Galatians 6:3 For if anyone thinks he is something, when he is nothing, he deceives himself.)*

Meanwhile, they are in flagrant violation of child obscenity laws by distributing pornographic content to minors, and they are in violation of tort law and products liability law by selling their products in a manner that expose their customers to vicious onslaughts of the pornography predators. *(Luke 17:2. It would be better for them to be thrown into the sea with a millstone tied around their neck than to cause one of these little ones to stumble.)* Amending the complaint will reemphasis to the Defendants that they are not above the law. *Romans 13:1 Let every person be subject to the governing authorities. For there is no authority except from God, and those that exist have been instituted by God.)*

Additionally, I do not expect Sara Ford to be able to tie her shoes let alone get a single thing correct in this action. To begin with she mocks justice and mocks this Court by attempting to falsely categorize me as some "lawyer dog," like herself. *Proverbs 12:22 lying lips are an abomination to the Lord, but those who act faithfully are his delight.* Apple and Hewlett-Packard are in the business of prostitution, and Professor Ford's appearance here is a symbolic representation of prostitution in kind, as she advances hyper-technical arguments to defend practices that are causing sex trafficking demands to sky rocket. Meanwhile her personal value system is entirely opposed to the position she advances in the same way a prostitute is merely pretending as she services her John for pay. Apple and Hewlett-Packard are pimping her out. I am not like her. I'm no licensed attorney, like the ones she falsely compared me to in these cases

in violation of her duty of candor toward the tribunal. *Smith v. Plati*, 258 F.3d 1167, 1174 (10th Cir. 2001); *Olivares v. Martin*, 555 F.2d 1192, 1194 n.1 (5th Cir. 1977); *Friederichs v. Gorz*, 624 F. Supp. 2d 1058, 1063 n. 5 (D. Minn. 2009); *Richards v. Duke Univ.*, 480 F. Supp. 2d 222, 234 (D.D.C. 2007).

I am most certainly not subject to the same pleading standard by any means, and unsurprisingly, the cases and arguments Professor Ford is being paid hand over fist to make will continue to support my positions throughout this controversy until Apple and Hewlett-Packard are expose as the fraud mongers that they are and brought to accountability for dastardly exploiting the male biology and exposing us guys to vicious undue influence of predatory pornographers. Whether most of us men know it or not, after being warped by Apple and Hewlett-Packard products, we really do not want to see women as objects, we prefer to have intimacy with them. But Professor Ford and I will have intimate relations with the BPR before this controversy is over if she continues to knowing put forth knowingly false statements to this court to justify her Defendants porn factories and distribution channel of illegal content that is the primary gas that is fueling the ever expanding sex trafficking epidemic across the globe. By falsely asserting that I am a lawyer dog like herself, she deliberately violated rule 3.3 to advance her client's illegal and damaging cause. Just because Apple and Hewlett-Packard believe that they are immune child obscenity laws and products liability laws does not mean that Professor Ford is by extension above the law. Despite this lower pleading standard threshold - that I am subject to - I shall amend.

APPLE

Genesis 3:4 And the serpent said to the woman, You shall not surely die.

The biggest reason for allowing me to Amend the complaint is to shine a light on the Apple's misdirection. In April 2010, a man named Matthew Mr. Browning wrote Steve Jobs, about his decision to not allow porn apps to be down loaded to the iPhone. Mr. Browning was upset that he was not going to have access to these porn apps that would feed his addiction that Apple started. As part of his withdraw, he complained. Steve Jobs responded, "we do believe we have a moral responsibility to keep porn off the iPhone. Folks who want porn can buy and [sic] Android phone." In his response, Mr. Jobs, as an authorized agent of Apple, confirmed that they are violating inherent morality by not automatically keeping porn off of their devices. Apple publicly postured to be taking a stand against pornography to fool the public. However, Apple sells their iPhone with Safari, which is the greatest porn app of all time. These defendants want to give the public the apprehension that they are against pornography, when they are in bed with sexual predators and pornographers in the same way that Backpages.com is. Apple and Hewlett-Packard are profiteering off of the backs of predator pornography companies who are aggressively using every trick in the book to entice Apple and Hewlett-Packard customers to get addicted to their product, which causes a actual dependency and attachment to Apple and Hewlett-Packard's products. This is flagrant fraud and addiction by trick, while abusing their fiduciary relations in holding themselves are superior technological advanced engineering experts. Apple's refusal to make porn apps available was not even carried out in good faith. They were trying to market themselves as being more family friendly and Android. Steve Jobs put forth to the public that if a person wanted porn Apps, they should buy and Android. Yet, this was classic misdirection because Apple products are by no means sold as "porn free" devices. This

kind of false advertising and fraud that poses a threat to the very families that Apple claims to protect is intolerable. This is outrageous. I shall amend.

State in other words, Apple knows and admits that it is violating inherent morality by making porn readily available on their machines; yet, Apple knows that they are making money on the backs of the online pornographers who are causing their customers to get addicted to their products - neurological attachment. Apple and Hewlett-Packard are engaged in propaganda-type-sham attempts to take a stand against pornography in a manner that would make Joseph Goebbels proud. Meanwhile, Apple is not doing anything about the problem other than making excuses and encouraging it. Apple and Hewlett-Packard products are the greatest distributors of pornography of all time. They have removed traditional barriers that kept men from accessing porn and doing so anonymously. They have hijacked our capacity for intimacy, they have placed our children at risk, and they have threatened our National security from within by assaulting traditional families, exposing them to the horrors of predatory pornographers. This is OUTRAGEOUS! Apple and Hewlett-Packard should be preparing for major class action lawsuits and more and more people step out of the shadows to realize the scam that these Defendants are running. Federal and state prosecutors should prosecute Apple and Hewlett-Packard executives under RICCO, just as they should target back pages.com. The United States and Tennessee law enforcement should not treat the symptom of the problem, they should attack the root, regarding matters that they already have jurisdiction in to regulate. We all must stand up for families and children. Accordingly, I shall amend.

HEWLETT-PACKARD

Job 4:8 As I have seen, those who plow iniquity and sow trouble reap the same

Let's just talk about Hewlett-Packard for a minute. There are more child porn related cases clogging the Federal Court dockets involving child porn that was accessed and distributed on a Hewlett-Packard device than any other computer. Congratulations Hewlett-Packard that is quite a legacy? I cringe to imagine the number of men who would not be suffering in jail had they purchased a Hewlett-Packard computer that had pre-set filters and were subject to a system that required the purchaser to have to look an HP clerk in the face before asking to acquire a passcode to enable him to see porn. The number of child porn victims and victimizers would be radically reduced. The 4 A's of online pornography would be all but eliminated. But very obviously Hewlett-Packard, like Apple, could care two cents about these victims of their defective and dangerous products. They only care about maximizing profits and fooling the public into thinking that they are not in step with the predatory pornographers who hunt them down. Hewlett-Packard is unquestionably ratifying, enabling, authorizing, provoking, and encouraging pornographic predators to entice their costumers into becoming addicting to online pornography for the ultimate benefit of Hewlett-Packard.

There is a saying that my friend Justin Timberlake sings about in a music video that features Scarlett Johansson, "What goes around comes back around." In August 2010, Hewlett-Packard boss, Mark Hurd, was fired after a former porn star/employee of Hewlett-Packard accused him of sexual harassment. (The Apple does not fall far from the tree and apparently Mark Hurd was accessing pornography on his HP outside the presence of his wife as well). The message that Hewlett-Packard intended to send the public in firing Mr. Hurd was that it was opposed to sexual harassment and sexual misconduct. Meanwhile, Hewlett-Packard continues to intentionally sell their products in a defective and dangerous manner that encourages and warps

their customers into engaging in a host of sexual deviant and destructive behaviors. This kind of hypocritical and fraudulent marketing and misdirection is outrageous. (*Psalms 119:163 I hate and abhor lying: but your law do I love; 1 Timothy 4:2 Speaking lies in hypocrisy; having their conscience seared with a hot iron*). Hewlett-Packard products are sold in a manner that proliferates addiction, poisons the heart, and threatens the very families they market to. Hewlett-Packard could easily fix this problem by deciding to sell their products with filters and actually comply with child obscenity laws, but instead, its too drunk off of the income it is making off of the backs of the predatory pornographers that they are in bed with. I shall amend.

/s/ Chris Sevier/
9 Music Square 247
Nashville, TN 37203
ghostwarsmusic@gmail.com
615 500 4411
no lawyer

The fool says in his heart, "There is no God."
They are corrupt, their deeds are vile; PSALM 14:1-7

CERTIFICATE OF SERVICE

This motion was served on opposing counsel through ECF/PACER Filing System to the Defendants Attorney's of record to Tom-SexTrafficking-Wiseman at tom@wisemanashworth.com, and Professor Sara-Conflict of interest-Ford at sford@lightfootlaw.com

/s/Chris Sevier/
9 Music Square South

Nashville, TN 37203
615 500 4411

ghostwarsmusic@gmail.com

BPR#026577